

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL NO. 2323

SHORT FORM COMPLAINT

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and (if applicable)
Jones v. National Football League [et al.]
No. 2:12-1027 (E.D.Pa.)

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JAMMAL LORD

JURY TRIAL DEMANDED

SHORT FORM COMPLAINT

1. Plaintiff(s), **JAMMAL LORD**, (and, if applicable, Plaintiff's Spouse) bring(s) this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL NO. 2323.

2. Plaintiff (and if applicable, Plaintiff's Spouse) is/are filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.

3. Plaintiff (and if applicable, Plaintiff's Spouse), incorporate(s) by reference the allegations (as designated below) of the Master Administrative Long-Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.

4. ~~[Fill in if applicable] Plaintiff is filing this case in a representative capacity as the~~
_____ of _____, having been duly appointed as the _____
_____ by the _____ Court of _____.

~~(Cross out sentence below if not applicable.) Copies of the Letters of Administration/ Letters Testamentary for wrongful death claim are annexed hereto if such Letters are required for the~~

~~commencement of such a claim by the Probate, Surrogate or other appropriate court of the jurisdiction of the decedent.~~

5. Plaintiff, **JAMMAL LORD** is a resident and citizen of **Texas** and claims damages as set forth below.

6. ~~[Fill in if applicable] Plaintiff's spouse is a resident and citizen of Texas and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband/decedent.~~

7. On information and belief, the Plaintiff (or decedent) sustained repetitive, traumatic sub-concussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff suffers (or decedent suffered) from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff (or decedent) sustained during NFL games and/or practices. On information and belief, the Plaintiff's (or decedent's) symptoms arise from injuries that are latent and have developed and continue to develop over time.

8. [Fill in if applicable] The original complaint by Plaintiff(s) in this matter was filed in the **United States District Court for the Southern District of Texas**. If the case is remanded, it should be remanded to **United States District Court for the Southern District of Texas**.

9. Plaintiff claims damages as a result of [check all that apply]:

- ☒ Injury to Herself/ Himself
- ☐ Injury to the Person Represented
- ☐ Wrongful Death
- ☐ Survivorship Action

☒ Economic Loss

☐ Loss of Services

☐ Loss of Consortium

10. ~~[Fill in if applicable] As a result of the injuries to her husband JAMMAL LORD, Plaintiff's Spouse suffers from a loss of consortium, including the following injuries:~~

~~☒ loss of marital services;~~

~~☒ loss of companionship, affection or society;~~

~~☒ loss of support; and~~

~~☒ monetary losses in the form of unreimbursed costs she has had to expend for the health care and personal care of her husband.~~

11. ~~[Check if applicable] _____ Plaintiff (and Plaintiff's Spouse, if applicable) reserve(s) the right to object to federal jurisdiction.~~

DEFENDANTS

12. Plaintiff (and Plaintiff's Spouse, if applicable) bring(s) this case against the following Defendants in this action [check all that apply]:

☒ National Football League

☒ NFL Properties, LLC

13. ~~[Check where applicable] As to each of the Riddell Defendants referenced above, the claims asserted are: _____ design defect; _____ informational defect; _____ manufacturing defect.~~

14. ~~[Check if applicable] _____ The Plaintiff (or decedent) wore one or more helmets designed and/ or manufactured by the Riddell Defendants during one or more years Plaintiff (or decedent) played in the NFL and/ or AFL.~~

15. Plaintiff played in [check if applicable] √ the National Football League ("NFL") and/or in [check if applicable] the American Football League ("AFL") during **2004 to 2006** for the following teams: **Houston Texans and Indianapolis Colts.**

CAUSES OF ACTION

16. Plaintiff herein adopts by reference the following Counts of the Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

 √ Count I (Action for Declaratory Relief-Liability (Against the NFL))

 √ Count II (Medical Monitoring (Against the NFL))

 Count III (Wrongful Death and Survival Actions (Against the NFL))

 √ Count IV (Fraudulent Concealment (Against the NFL))

 √ Count V (Fraud (Against the NFL))

 √ Count VI (Negligent Misrepresentation (Against the NFL))

 Count VII (Negligence Pre-1968 (Against the NFL))

 √ Count VIII (Negligence Post-1968 (Against the NFL))

 Count IX (Negligence 1987-1993 (Against the NFL))

 √ Count X (Negligence Post-1994 (Against the NFL))

 Count XI (Loss of Consortium (Against the NFL ~~and Riddell~~
Defendants))

 √ Count XII (Negligent Hiring (Against the NFL))

 √ Count XIII (Negligent Retention (Against the NFL))

_____ Count XIV (Strict Liability for Design Defect (Against the Riddell Defendants))

_____ Count XV (Strict Liability for Manufacturing Defect (Against the Riddell Defendants))

_____ Count XVI (Failure to Warn (Against the Riddell Defendants))

_____ Count XVII (Negligence (Against the Riddell Defendants))

 ✓ Count XVIII (Civil Conspiracy/Fraudulent Concealment (Against ~~All~~ the NFL Defendants))

17. Plaintiff asserts the following additional causes of action [write in or attach]:

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and Plaintiff's Spouse, if applicable) pray(s) for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose laws will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorneys' fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff(s) hereby demand(s) a trial by jury.

DATED: this 15th day of May, 2013.

Respectfully submitted,

/s/ Jeffrey M. Stern
Jeffrey M. Stern
TBA No. 19175660
SD No. 8536
4909 Bissonnet St., Suite 100
Bellaire, Texas 77401-4051
Tel. No. (713) 661-9900
Fax No. (713) 666-5922

ATTORNEY-IN-CHARGE FOR PLAINTIFFS

OF COUNSEL:

Ali Mokaram
Peyman Momeni
Mokaram Law Firm
2500 West Loop South, Suite 450
Houston, Texas 77027
Tel. No. (713) 952-4445
Fax No. (713) 952-4525

The Stern Law Group
4909 Bissonnet St., Suite 100
Bellaire, Texas 77401-4051

Keith W. Lapeze
The Lapeze Firm, P.C.
1113 Vine Street, Suite 100
Houston, Texas 77002
Tel. No. (713) 739-1010
Fax No. (713) 739-1015